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BOARD OF COMMISSIONERS OF PILOTS  
OF THE STATE OF NEW YORK

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14 June 2007

To: The Honorable Members of the National Transportation Safety Board:

Mark V. Rosenker, Chairman  
Robert L. Sumwalt, Vice Chairman  
Deborah A. P. Hersman, Member  
Kathryn O'Leary Higgins, Member  
Steven R. Chealander, Member

Re: National Transportation Safety Board Marine Accident Press  
Release and Marine Accident Brief Report Dated May 30, 2007 SB-07-  
29, M/V NEW DELHI EXPRESS

The Board of Commissioners of Pilots of the State of New York ("the Board") has reviewed the National Transportation Safety Board ("NTSB") Press Release and Marine Accident Brief and wishes to express its serious concerns over the apparent lack of full development of factual information in the NTSB's investigation regarding the M/V NEW DELHI EXPRESS.

The Board finds aspects of the Marine Accident Brief and the NTSB Press Release dated 30 May 2007 covering an accident that occurred in New York/New Jersey boundary waters, involving a New York State licensed pilot and a New Jersey licensed docking pilot, extremely disappointing. To simply state that "this accident could have been prevented if previously issued NTSB safety recommendations regarding Bridge Resource Management had been implemented" is, quite frankly, disingenuous in light of the Board's well documented commitment to continuous advanced pilot development and training, including Bridge Resource Management.

The Board has implemented advanced, recurrent pilot training that has been part of Board safety policy and procedure since 1995, a fact which is more fully described in the Board's Annual Report which is regularly sent to the NTSB and also published on its website. Further, copies of all Board Investigative Opinions and Orders of the Board are sent to NTSB. We also note that NTSB failed, as a matter of due diligence, to contact the Board during the course of its investigation to discuss the extent of existing Board Bridge Resource Management training policies.

In addition, having reviewed the transcript of the Voyage Data Recorder, the Board fails to find any breakdown in Bridge Resource Management techniques or procedures.

The NTSB has not fully developed the issues and facts that contributed to this casualty. We believe the NTSB voted on and accepted the findings and safety recommendations based on an incomplete and flawed investigation.

We respectfully request the Board's comments be reviewed and made a part of the record prior to release of the NTSB report.

Should you require more detailed information on the Board and its policies and directives, please contact us.

Respectfully,

 .....for (BY DIRECTION)  
Richard H. Hobbie III, President  
Board of Commissioners of Pilots of the State of New York

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